From: bill firschein

**Sent:** Tuesday, October 14, 2003 1:42 PM

To: Dabbs, Paul

Cc: Subject:

Mr. Paul Dabbs, cal dept of water resources, planning branch

Request for Comments:

looking over the briefing draft i could point out at least one area that is bereft of science. unfortunately most of the recommendations consist of how to spin the idea of recycled water use to overcome the public's caution.

potential impacts do not include the dangers of contamination to the acquifer, as seen in lancaster, or to the movement of soils that may result in potential damage to the foundations of buildings where injection has been practiced for a length of time in the the forebay area. if i recall correctly, the geologists recorded cyclical movements of seven or eight inches. the state may not be insured for this risk.

the cost benefit analysis is too sketchy to make any reasonable argument based on it. and lack of criteria for testing and approval of various levels of safety is not there at all. there is no real evidence provided for changing appendix j of the plumbing code regarding the warning.

just one thought to leave you with: performance measurements coupled with benefit-cost analysis, is one of those ideas that sound good. however, a) it is not possible to carry out realistic performance measurement of complex systems; i.e., the dwp has been engaged in an unsuccessful campaign in the montebello forebay area, for the past few years, to convince people to drink the water. it may be that the main reason that health effects have failed to show up is because people will not drink the water in the first place.

b) the acquifer may reach a critical phase in which sudden non-linear effects occur, c) government is not necessarily an honest broker in making policy and writing and enforcing codes; and individuals may not cooperate. i dont think that the employment of an ombudsman will affect this at all.

Bill Firschein, AIA